

Jennifer R. Budd
Attorney At Law



United Plaza, 19th Floor
30 South 17th Street
Philadelphia, PA 19103

T: 215.564.1700 | F: 267.238.4415
jbudd@cohenseglias.com
www.cohenseglias.com

September 28, 2020

VIA ELECTRONIC MAIL & FACSIMILE

The Honorable Gene E.K. Pratter, U.S.D.J.
United States District Court
for the Eastern District of Pennsylvania
601 Market Street, Room 10613
Philadelphia, PA 19106

***Re: D.A. Nolt, Inc. vs. The City of Philadelphia and The Philadelphia Municipal Authority
U.S.D.C. for the E.D. of PA, Civil Action No. 18-cv-04997-GEKP***

Dear Judge Pratter:

I write regarding the trial in this matter scheduled for trial from January 11-18, 2021. I write to request that the trial be continued by one month.

The Philadelphia office is the headquarters of our firm. We have been in our current office space for 15 years, but the lease term expires on December 31, 2020. The firm has been planning to move offices for over two years, which involved design and construction in the new building to which we are moving. Construction was due to start this past spring. However, due to the pandemic, the Philadelphia Department of Licenses and Inspections was unable to process construction permit requests in the usual time-frame and the contractor experienced a three (3) month delay in obtaining a permit to begin construction in the new office. As a result, construction will not be completed before our lease term expires, and our firm will need to transition to completely remote in December, including our servers and support staff. Completion is now expected in late January.

Because the Philadelphia office is the headquarters of the Firm, the lack of physical office space and support staff, for even one month, is a great challenge. Although plans are being generated to ensure that we continue to provide competent representation to our clients, trying a case with such limitations could be prejudicial to the plaintiff. As a result, I respectfully request the trial be rescheduled to February 2021 so that our representation of the plaintiff will not be impacted.

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I have spoken with counsel for Defendants and they indicated that they do not object to this request.

Respectfully,

A handwritten signature in blue ink, appearing to read "Jennifer R. Budd".

JENNIFER R. BUDD

JRB:nmg

cc: Amy M. Kirby, Esq. (via e-mail)
Michael Pfautz, Esq. (via e-mail)